

ORIGINAL  
FILE

BEFORE THE

**Federal Communications Commission**

SEP 11 1992

In the Matter of

WASHINGTON, D.C. 20554

Part 90 Fire Call Box  
Operations in the 72-76 MHz  
Frequency Band

PR Docket No. 92-153

**COMMENTS OF THE  
INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, INC.  
AND THE INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION**

The International Association of Fire Chiefs, Inc. ("IAFC") and the International Municipal Signal Association ("IMSA"), hereinafter jointly referred to as IMSA/IAFC, respectfully jointly submit these Comments to the Federal Communications Commission's Notice of Proposed Rulemaking ("NPRM") in the above captioned proceeding.<sup>1/</sup>

**I. INTRODUCTION**

IAFC is a voluntary professional membership society. Its more than 9,000 members, comprised of senior fire officials, are dedicated to the protection of life and property throughout the United States and abroad. IAFC is the major national professional association representing the interests of senior fire service managers.

<sup>1/</sup> 7 FCC Rcd 4571 (released, July 22, 1992).

No. of Copies rec'd  
Listed Code

0+6

IMSA is a non-profit organization devoted to the development and use of electrical signalling and communications systems in the furtherance of public safety. The members of IMSA include representatives of federal, state, county, city, township and borough governmental bodies and representatives of governmental bodies from foreign nations. Organized in 1896, IMSA is the oldest organization in the world dedicated to the public safety use of radio technology.

Collectively IMSA/IAFC are recognized as the frequency coordinating committee for the Commission's Fire Radio Service, and, in conjunction with the National Association of Business and Educational Radio, Inc., constitute the recognized coordinating committee for the Special Emergency Radio Service. IAFC and IMSA regularly express their views before the Commission on issues affecting the Public Safety and Special Emergency Radio Services.

## **II. COMMENTS**

### **A. The Commission Should Grant the Fire Radio Service Authority to Operate on the Requested Low Power Frequencies.**

IAFC/IMSA commend the Commission for its prompt action in responding to their request for additional low power frequencies. By its responsiveness, the Commission has recognized the need for maintaining frequencies free from interference for emergency use.

IMSA/IAFC support the Commission's proposed rule establishing authority for Fire Radio Service eligibles to operate fire call boxes on ten additional low power (1 watt) channels in the 72-76 MHz band. These channels currently are

reserved for low power mobile use and are coordinated and shared by the Forest Products, Special Industrial, Railroad and Manufacturers Radio Services.

The Fire Radio Service requires access to these frequencies to resolve the interference problem currently experienced on the frequencies presently allocated to the Fire Radio Service for fire call box operations. This interference results from the fact that the currently available frequencies are shared with other radio services which transmit at a power level greater than the one watt output used by the Fire Radio Service for the fire call boxes. These channels are uncoordinated, and the power disparity between low power fire call boxes and the higher power transmitters used by other services adversely affects the operation of fire call box systems. Such interference poses a hazard to the safety of people and property.

**B.    The Commission Should Amend its NPRM to Include the Additional Low Power Frequencies Requested in the Supplement.**

IAFC/IMSA notes that the Commission did not affirmatively respond to the IMSA/IAFC's joint supplemental request asking for access to the twenty additional channels currently proposed for low power use in the Manufacturers Radio Service in PR Docket 91-295. The Commission based its decision not to include these frequencies in this rulemaking on the fact that its proceeding in

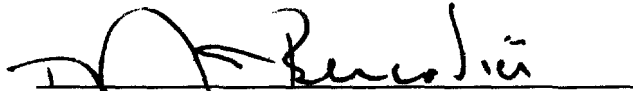
PR Docket 91-295 was not concluded at the time the NRPM in this proceeding was issued. NPRM, Note 2. IMSA/IAFC understands that these frequencies now have been coordinated by the Interdepartment Radio Advisory Committee for private system low power use. Presumably, completion of PR Docket 91-295 is imminent. In light of this development, and considering that there was no opposition to IAFC/IMSA's supplemental request, IMSA/IAFC renews its request for access to these additional channels to further spread frequency use and so reduce the interference potential to the Fire Radio Service on the low power channels.

### **III. CONCLUSION**

**WHEREFORE THE PREMISES CONSIDERED,** the International Municipal Signal Association and The International Association of Fire Chiefs, Inc. hereby respectfully request that the Federal Communications Commission adopt its Notice of Proposed Rulemaking

in this proceeding, granting the Fire Radio Service access to the proposed ten channels, as well as access to the additional twenty channels requested in the supplement to the Petition for Rulemaking.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'M. Bercovici', is written over a horizontal line.

Martin W. Bercovici  
Carol Moors Toth  
**KELLER AND HECKMAN**  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001  
202-434-4100

Attorneys for  
The International Municipal  
Signal Association  
and the  
International Association of  
Fire Chiefs, Inc.

Dated: September 11, 1992